

To: Richard Mylott/R8/USEPA/US@EPA[]
From: "Woodworth, Chad" <Chad.Woodworth@ihs.com>
Sent: Tue 5/22/2012 5:06:14 PM
Subject: SSP&A review of Pavillion water contamination
[this report](#)
[independent review of EPA's December 2011 draft report](#)

Hi Rich, I just called and left you a message (though I think I forgot to mention Pavillion) about this report by SSP&A and EPA's analysis of water quality issues in Wyoming.

Here's a brief description of the report from an industry contact:

Pavillion Study Confirms EPA Errors – An independent review of EPA's December 2011 draft report on natural gas drilling in Pavillion, Wyoming by S.S. Papadopoulos & Associates, a leading groundwater and hydrogeology consulting firm with more than 30 years of experience, found that the data and analysis does not support the EPA's conclusions. The report says the agency's primary claim of contamination caused by hydraulic fracturing activity is inaccurate and incomplete. The review also notes that EPA employed unapproved analytical methods and improperly conducted various field procedures; misinterpreted data used to draw conclusions; and EPA's "lines of evidence" can be adequately explained with alternative hypotheses. SSP&A identified the following specific deficiencies related to EPA's study: 1) Poor Study Design, 2) Lack of Baseline and Background Data, 3) Analytical Concerns Leading to Incorrect Conclusions, 4) Serious Errors in the Construction, Development and Sampling of Monitoring Wells, 5) Lack of Suitable Samples and 6) No Source Identification, among the larger problems.

Does EPA have a comment? Thanks.

Chad Woodworth

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